

EXHIBIT C

Dwight McKenna, M.D.

7/27/2018

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
JACKSON DIVISION

DENISE TREPAGNIER NO. 3:16-cv-00615
vs.
ALIMAK HEK, INC., ET AL JUDGE: BARBOUR

Video deposition of DWIGHT MC KENNA,
M.D., taken on FRIDAY, July 27, 2018, in the
law office of THE CHOPIN LAW FIRM, 650
Poydras Street, Suite 1550, New Orleans,
Louisiana.

REPORTED BY:

JAN I. SCHMIDT, CCR
Certified Court Reporter

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1 A No. I said that all along she was
2 disabled.

3 Q Well, you said that she was unable to
4 return to work, but you never actually used
5 the term disabled.

6 A I don't think that's correct. The
7 patient remains disabled and unable to work.
8 I think you can see that throughout.

9 Q I apologize, I may have had that wrong.

10 A Yes.

11 Q It was the first time that you referred
12 to her as being disabled for life?

13 A Yes. And her life disability,
14 certainly after the kidney cancer. Now when
15 I look at the patient with all of the things
16 I know, one kidney gone, surgery on the
17 other kidney, depression, some fairly
18 significant cervical disc disease, other
19 complaints, that she's not going to work
20 again. That was my opinion.

21 Q And to be sure, this opinion did not
22 arise until after the report of kidney
23 cancer to you?

24 A Yes. I think that she may have been
25 able to go back to work later on, but in the